

**REMARKS**

Claims 1, 3-12 and 14-16 are all the claims pending in the application. Claims 1, 7, 9-11 and 14 are being amended. Claim 16 is being added.

**I. Claim Rejections Under 35 U.S.C. § 103**

The Examiner rejected claims 1, 3-5, 7-12 and 14-15 under 35 U.S.C. § 103(a) as being unpatentable over Shen (US 2004/013120) in view of Killian (US 6,064,671).

The Applicant herein amends claims 1, 7, 9-11 and 14 to more particularly describe how the routing tables include default destinations that are individually assigned to a network adapter, such that the network adapter that is individually associated to a particular destination is listed as an interface for the default destination of the individually associated routing table. Specifically, claim 1 now describes how the first routing table “defines a first default destination individually associated with the first network adapter, such that the first network adapter is listed as an interface for the first default destination.” A similar description is provided for the second routing table, second default destination and second network adapter.

Neither Shen nor Killian, taken alone or in combination, disclose a first routing table with a default destination that is individually associated with a first network adapter and a second routing table with a default destination that is individually associated with a second network adapter, *such that the first network adapter is listed as an*

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*interface for the first default destination and such that the second network adapter is listed as an interface for the second default destination. The individual association described herein allows the inventive method to relay traffic from the source to the target destination by “selecting one of the first or second routing tables, such that by selecting the first routing table, the first network adapter is accessed as a default destination route, and by selecting the second routing table, the second network adapter is accessed as a default destination route,”* as is further described in claim 1. Neither Shen nor Killian, taken alone or in combination, disclose, suggest or provide any motivation for a method of relaying traffic using the routing tables described above.

Shen does not teach the use of individually associated routing tables, such that a network adapter is listed as an interface for a default destination, as Shen provides for different destinations to use the same interface (external destinations ED2 and ED5 of routing table VR-B (407A) both use interface I/F4; see Fig. 4 of Shen). As the Examiner has stated previously, Shen fails to teach the use of default destinations in its routing tables, and specifically fails to teach where the first and second routing tables define first and second destinations as default destinations.

Killian only teaches the use of a default destination in a routing table, which the Applicant has already disclosed in the Specification at p. 14. Killian does not teach where a network adapter is individually associated with a default destination, such that a network adapter is listed as an interface for a default destination. Claim 1 specifically

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describes how the first routing table “defines a first default destination individually associated with the first network adapter, such that the first network adapter is listed as an interface for the first default destination.”

In the Final Office Action, the Examiner cites to Killian as teaching the features of “defining first and second destinations as default destinations,” but Killian does not actually teach a network with multiple routing tables with multiple default destinations. Claim 1 explicitly describes the use of the first and second routing tables, both with default destinations. Killian also fails to teach a method that uses more than one routing table with default destinations that are individually associated with a network adapter. Claim 1 also describes how the second routing table defines “a second default destination, wherein the second default destination is individually associated with the at least one second network adapter, such that the second network adapter is listed as an interface for the second default destination.”

The Applicant refers the Examiner to p. 15, third paragraph, of the Specification, for support for the amendments to the pending claims.

#### Claims 2-6

The Examiner rejected claim 6 under 35 U.S.C. § 103(a) as being unpatentable over Shen-Killian, in view of Zhou (US 2002/0138578).

The Applicant submits that claims 2-6 are allowable at least based on their dependency to claim 1.

Claims 7-12, 14-15

The Applicant submits that claims 7-12 and 14-15 are also allowable over Shen and Killian for at least the reasons described above with regard to claim 1. Specifically, neither Shen nor Killian describe “an individually associated routing table where the network adapter is listed as the interface for a default destination route,” as recited in claims 7, 9-11 and 14. Shen does not disclose where a network adapter is individually associated with a default destination route, as Shen permits different destinations to use the same adapter/interface, and Shen fails to disclose the use of default destinations. Killian fails to cure what Shen lacks, as Killian only discloses the idea of a default destination in a routing table, but does not indicate that the default destination is individually associated with a network adapter.

Claims 8, 12 and 15 are allowable at least based on their dependencies to their respective independent claims, as discussed above.

Claim 16

The Applicant adds claim 16 to capture an additional embodiment of the invention as illustrated in Fig. 3, wherein each of the first and second routing tables comprise specific destinations that only point to another routing table. The Applicant submits that neither Shen nor Killian teach, suggest or provide any motivation for the newly claimed embodiment.

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**II. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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